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January 26, 1994

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OFFICE OF THE SECRETARY

BY HAND DELIVERY

William Caton
Office of the Secretary
Federal Communications Commission
1919 M Street, Room 222
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Re: ET Docket No. (93-266) Review of the Pioneer's Preference Rules; Gen. Docket No. 90-314, Amendment of the Commission's Rules to Establish New Personal Communications Services

Dear Mr. Caton:

Enclosed are ten copies of a letter written to Mr. Andrew S. Fishel for inclusion in the record in the above-captioned proceedings. Please return a date-stamped copy to the person delivering them. Copies have been served on all parties to the proceedings.

Sincerely,

Michael Kellogg
Michael K. Kellogg

Enclosures

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January 26, 1994

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Re: ET Docket No. 93-266, Review of the Pioneer's Preference Rules; Gen. Docket No. 90-314, Amendment of the Commission's Rules to Establish New Personal Communications Services

Dear Mr. Fishel:

I have been retained to represent Pacific Bell in the two above-referenced matters. I am writing this letter in anticipation of judicial review and pursuant to 47 C.F.R. § 1.1214, which imposes on all parties a duty to notify you whenever there is substantial reason to believe that a party may have violated the Commission's ex parte rules.

The portion of Gen. Docket No. 90-314 dealing with specific pioneer's preference awards is a restricted adjudicatory proceeding in which ex parte contacts are prohibited. Tentative Decision and Memorandum Opinion and Order, Amendment of the Commission's Rules to Establish New Personal Communications Services, 7 FCC Rcd 7794, 7813 (1992). One recipient of a pioneer's preference award in that proceeding -- American Personal Communications ("APC") -- reports having made 25 ex parte contacts in the days leading up to the announcement of the final awards on December 23, 1993.¹ In a letter memorializing one of its contacts, APC specifically notes that it made an ex parte presentation concerning "the pioneer preference portion of

¹See, e.g., Letters from Kurt A. Wimmer to William F. Caton (Nov. 2, 8, 17, 19, 23, and 24, 1993, and Dec. 1, 3, 6, 9, 10, 16, 17, 20, 1993) (memorializing between one and six contacts each).

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Docket 90-314."² In another letter, APC contends that the participants did not discuss the "rulemaking issues" or "who should receive a pioneer preference."³ Since these two exclusions cover everything at issue in Gen. Docket 90-314, however, it is unclear what issues APC did raise. The remaining letters do not indicate whether APC's presentations excluded the restricted portion of the proceeding.

In addition, Omnipoint Communications ("Omnipoint") sent the Commissioners a letter addressing the merits of its award while the award was still at issue. Letter from Omnipoint to the Commission 6 (Sept. 29, 1993) ("No other company, in any docket, was the subject of so many experimental reports. No other company besides Omnipoint . . . allowed its technology or innovations to be tested by the competing pioneers applicants for critique during the comment period" (emphasis omitted)). While 47 C.F.R. § 1.1202(b)(1) requires written communications to be served on the parties, Omnipoint's letter contains no indication that such service was made.⁴

²Letter from Kurt A. Wimmer to William F. Caton (Nov. 2, 1993). The letter indicates that at least part of that discussion occurred in response to a question asked by the Office of the General Counsel. It does not indicate, however, whether the discussion was limited to answering that one question. In any event, the letter did not summarize the information given and was not served on the parties to the proceeding as required by 47 C.F.R. § 1.1204(b)(7) (note) ("In a restricted proceeding, . . . a summary of any new oral information shall be served by the person making the presentation upon the other parties to the proceeding").

³Letter from Jonathan D. Blake to William F. Caton (Sept. 29, 1993).

⁴APC and Cox Enterprises ("Cox") filed similar letters. See Letter from APC to the Commissioners (Sept. 27, 1993); Letter from Cox to the Commissioners (Sept. 28, 1993). Neither of those letters contains a proof of service clearly sufficient to satisfy 47 C.F.R. § 1.47, although APC and Cox did indicate on the signature pages of their letters that they had sent copies to all the parties in Gen. Docket No. 90-314.

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Although ET Docket No. 93-266 is a non-restricted proceeding at least in part,⁵ the disclosures made in that docket may have been inadequate as well. Under 47 C.F.R. § 1.1206(a)(2), any party making an oral ex parte communication must file a written memorandum summarizing the "data or arguments" presented if the data or arguments were not reflected already in the party's previous written filings in that proceeding. Because of the close nexus between these proceedings -- a portion of Gen. Docket No. 90-314 concerns which parties should receive pioneer's preferences, and a portion of ET Docket No. 93-266 involves whether parties who were tentatively awarded such preferences should retain them -- it is extremely important that the requirements of Section 1.1206(a)(2) be observed scrupulously here. Parties making ex parte contacts must list the subjects discussed and arguments presented to the extent they are not reflected in the party's previous written filings.

The three recipients of awards in Gen. Docket No. 90-314 all made ex parte contacts in ET Docket No. 93-266. Cox, which reports making four ex parte contacts in ET Docket No. 93-266 between November 3 and November 10, 1993, filed only summaries indicating that it discussed "outstanding issues in the Commission's Pioneer Preference Proceeding."⁶ Because Cox had not yet filed any comments in ET Docket No. 93-266,⁷ these discussions could not have been reflected in Cox's "previous" written filings. The letters offer no insight as to what

⁵The Notice of Proposed Rule Making is ambiguous. In paragraph 23, it states that ET Docket No. 93-266 is "a non-restricted notice and comment rule making proceeding." Notice of Proposed Rule Making, Review of the Pioneer's Preference Rules, 8 FCC Rcd 7692, 7695 (1993). However, it also notes that "many pioneer's preference requests have been formally opposed, and in these proceedings, no ex parte presentations are permitted" Ibid. If the words "these proceedings" is understood as including ET Docket No. 93-266, the Notice makes ET Docket No. 93-266 a restricted proceeding with respect to individual pioneer's preference requests.

⁶Letters from Werner K. Hertenberger to William F. Caton (November 3 (two letters), 4, and 10, 1993).

⁷Cox's comments in ET Docket No. 93-266 are dated November 15, 1993.

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"arguments or data" were presented to support Cox's "position." Nor do they indicate what Cox's position was.

Omnipoint reports making 11 ex parte presentations in ET Docket No. 93-266 in just over a month. Each letter memorializing the contact states only that it concerned "Omnipoint's position with respect to the Commission's proposals."⁸ In addition, Omnipoint's first four letters suffer from the same defect as Cox's: they fail to explain what arguments and data were used to support the party's "position" or what that position was -- even though Omnipoint, like Cox, had not filed any comments with the Commission at the time the ex parte contacts were made.⁹

Finally, APC reports making 30 ex parte contacts relating to ET Docket No. 93-266 during a roughly two-month period.¹⁰ The memorandum memorializing three early contacts states that APC discussed "issues relating to the . . . docket."¹¹ Once again, however, no written filings had been made, so the discussions could not have been "reflected" in APC's previous filings within the meaning of Section 1.1206(a)(2).¹² Yet the letter, like many of APC's letters, offers no insight as to what was discussed or the arguments or data offered. APC also filed a Request for

⁸Letters from Mark J. Tauber to William F. Caton (Nov. 1, 2, 3, 17, and 30, and Dec. 1, 2, 3, 1993).

⁹The first four letters (two of which are dated November 2, 1993) concern contacts made between November 1 and November 3, 1993. Omnipoint's comments were filed November 15, 1993, and the remaining contacts took place after that date.

¹⁰The letters listed in note 1, supra, which cited both Gen. Docket No. 90-314 and ET Docket No. 93-266, memorialize 25 of those contacts. The other five are memorialized in three letters from Kurt A. Wimmer to William F. Caton (Oct. 25 and 29, 1993, and Nov. 2, 1993). These letters cite only ET Docket No. 93-266.

¹¹Letter from Kurt A. Wimmer to William F. Caton (Oct. 25, 1993).

¹²The letter concerns contacts made on October 22 and October 23, 1993. See id. APC did not file its comments in ET Docket No. 266 until November 15, 1993, and filed its Request for Expedited Treatment on October 28, 1993.

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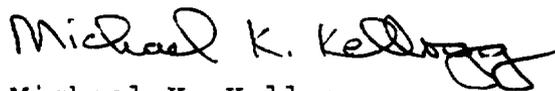
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Expedition in which it stressed the benefits of its obtaining a pioneer's preference and introducing its particular service as soon as possible.¹³

The Commission has been diligent about ex parte contacts in these matters, repeatedly warning the parties about the strict requirements of its rules. See, e.g., 8 FCC Rcd at 7695; 7 FCC Rcd at 7813; Report and Order, Establishment of Procedures to Provide a Preference to Applicants Proposing an Allocation for New Services, 6 FCC Rcd 3488, 3493, 3500 n.9 (1991). Indeed, confronted by apparent confusion regarding those rules, the Commission clarified them in February of 1993, warning the parties that "[f]ailure to comply with the ex parte rules in the future could result in . . . [the] imposition of sanctions." Ex Parte Presentations Relating to 2 GHz Personal Communications Services' Pioneer's Preference Requests, 8 FCC Rcd 1511 (1993).

I thank you in advance for your time and attention.

Yours sincerely,


Michael K. Kellogg

cc: Brian F. Fontes
Randall Coleman
Byron F. Marchant
Karen Brinkmann
Robert Pepper
Thomas Stanley
William Kennard
All Parties in ET Dkt. No. 93-266
and Gen. Dkt. No. 90-314

¹³American Personal Communications, Inc., Request for Separate and Expedited Treatment of "Existing Pioneer Preference" Issues, Review of the Pioneer's Preference Rules, ET Docket No. 93-266, at 8-9 (Oct. 28, 1993). To our knowledge, this request was not served on the parties in either ET Docket No. 93-266 or those in Gen. Docket No. 90-314.

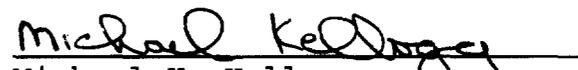
Certificate of Service

I, Michael K. Kellogg, certify that on this 26th day of January, 1994, I caused copies of the foregoing Letter to Andrew S. Fishel to be served by first class mail, postage prepaid, on the parties on the attached service list.

Michael K. Kellogg
Michael K. Kellogg

Certificate of Service

I, Michael K. Kellogg, certify that on this 26th day of January, 1994, I caused copies of the foregoing Letter to William F. Caton to be served by first class mail, postage prepaid, on the parties on the attached service list.


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